REMARKS

Claims 1-17 are pending in the application. Applicants gratefully acknowledge Examiner's indication that claims 3, 4, 8, 11, 12 and 16 include allowable subject matter and would be allowable if rewritten as suggested in the Office Action.

By the above amendment, claims 3, 8, 11 and 16 have been amended. The Examiner's reconsideration of the objections and rejections is respectfully requested in view of the above amendments and following remarks.

Claim Rejections - 35 U.S.C. §112

Claims 3, 8, 11 and 16 stand rejected under 35 U.S.C. §112, second paragraph. Applicants have amended the claims to remove the term "hypothetical", as suggested by the Examiner. Accordingly, withdrawal of the rejection is requested.

Claim Rejections - 35 U.S.C. §102

Claims 1, 2, 7, 9-10, and 15 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,697,849 to Carlson. Applicants respectfully submit that at the very minimum, claims 1 and 9 are patentably distinct and patentable over Carlson. Applicants maintain that on a *fundamental level*, Carlson does not teach or suggest methods for controlling web farms as contemplated by the claim, wherein a plurality of websites in the web farm can share servers assigned to different web sites for processing client requests. Carlson discloses nothing more than a method of load balancing among a plurality of backend application servers for **a given website**. (see, e.g., FIG. 2A of Carlson and accompany description). At the very least, the Examiner has not even demonstrated how Carlson discloses multiple websites.

Indeed, in the "Response to Arguments" section of the Final Office Action, the Examiner appears to equate "multiple websites" as being the same as Carlson's purported teaching of a

web application being distributed over a plurality of servers. It is respectfully submitted that this analogy is not correct.

A Website generally refers to a collection of Web pages (e.g., documents coded in HTML), which are linked to each other and possibly pages of other Websites. A Web site can reside on a server dedicated to that Web site only or a Web site can be distributed and reside on multiple servers. Therefore, while a single Web site may reside on different servers, this does not mean that the Website becomes multiple Web sites, as suggested by the Examiner. A Web site may include a web application that is executed by multiple web application servers, but does not change that the fact that the Web site is only deemed a single Web site.

Moreover, Carlson does not disclose *categorizing customer requests received from said plurality of websites into a plurality of categories, said categories comprising shareable customer requests which can be processed by servers of different websites and unshareable customer requests which can not be processed by servers of different websites*, as essentially recited in claims 1 and 9. Again, the "sticky requests" relied on by Examiner relates only to requests that are processed by a specific backend application server of a cluster of backend application servers for a given website, and are not analogous to the claimed "unsharable customer requests". In the response to Arguments section, the Examiner refutes this argument on the erroneous assumption that Carlson discloses multiple websites. In view of the above, it is clear that Examiner's reliance on Carlson in this regard is misplaced.

For at least the above reasons, claims 1 and 9 are not anticipated by Carlson. Moreover, claims 2, 7, 10 and 15 are not anticipated by Carlson at least by virtue of their dependence on respective base claims 1 or 9. Accordingly, withdrawal of the anticipation rejections is requested.

Claim Rejections - 35 U.S.C. §103

The following obviousness rejections were asserted in the Office Action:

(i) Claims 5 and 13 stand rejected as being unpatentable over Carlson in view of U.S. Patent No. 5,806,065 to Lomet;

(ii) Claims 6 and 14 stand rejected as being unpatentable over Carlson in view of Lomet and further in view of U.S. Patent No. 6,771,595 to Gilbert; and

(iii) Claim 17 stands rejected as being unpatentable over Carlson in view of Lomet.

Each of the above obviousness rejections (i) and (ii) is based, in part, on the contention that Carlson discloses the inventions of claims 1 and 9. Therefore, in view of the readily apparent deficiencies of Carlson as noted above with respect to claims 1 and 9, the obviousness rejections are legally deficient on their face. Moreover, it is readily apparent that neither Lomet nor Gilbert cure the deficiencies of Carlson in this regard.

For similar reasons discussed above, claim 17 is patentable and nonobvious over the combination of Carlson and Lomet. Indeed, at the very least, such combination does not disclose or suggest a web farm that comprises *a plurality of websites each having one or more servers assigned thereto,* much less, *means for categorizing said customer requests received from said plurality of websites into a plurality of categories, said categories comprising shareable customer requests which can be processed by servers of different websites and unshareable customer requests which can not be processed by servers of different websites*, as essentially recited in claim 17.

For at least the above reasons, withdrawal of the obviousness rejections is requested.

Respectfully submitted,

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